

Message

From: Keigwin, Richard [Keigwin.Richard@epa.gov]
Sent: 6/26/2017 12:13:10 PM
To: Ray McAllister [RMcAllister@croplifeamerica.org]
CC: Schaible, Stephen [Schaible.Stephen@epa.gov]; Steven J Goldberg [steven.goldberg@basf.com]
Subject: Re: Certificates of Origin

Thanks Ray. I am monitoring email and will be back in the office Tuesday morning.

We will need to run this proposal by both OGC and OECA. My understanding is that there may have been concerns with having this category as part of PRIA. How does this new proposal address those concerns?

Rick Keigwin
Acting Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Sent from my iPhone

On Jun 26, 2017, at 7:34 AM, Ray McAllister <RMcAllister@croplifeamerica.org> wrote:

Steve S.:

I got an automated response from Rick that he is out of the office for a few days. I hope that doesn't slow us down.

This is what I have in mind, loosely based on an example COO shared by one of our members, prepared by EPA a few years ago.

- A standard form letter would specify:
 - Physical address of the pesticide producing establishment;
 - Certification (or affirmation or verification) that the facility is actively registered (on date of letter) with EPA as pesticide producing establishment no. _____;
 - Statement that production of [Trade name] product, EPA Reg No. _____, was reported for [most recent completed year] at that establishment, as required by FIFRA §7.
 - This COO accompanies production lot number (or batch) _____, [specified by registrant].
 - Appropriate citation of authority in USC and CFR.
 - Standard disclaimers, if necessary. "EPA cannot verify that a specific batch or lot number of a given product

was produced in a specific pesticide producing establishment."

The exact details, content, and format would be worked out via discussion among the Agency, registrants, and the importing countries. Each letter would be standard, without customization other than identification of the establishment and the product.

We have discussed approaches to a number of other details. If you come across other snags or obstacles or questions, please give me a call. If we haven't already thought of it ... then we will think of it.

The announced purpose of the COOs is to combat importation of illegal and counterfeit products. I hope we can find a way to support that intent.

Ray S. McAllister, PhD
Senior Director, Regulatory Policy
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On Jun 23, 2017, at 4:51 PM, Schaible, Stephen <Schaible.Stephen@epa.gov> wrote:

Hi Ray,

As follow up to our call, can you please provide some proposed language you believe would satisfy the needs of importing countries and industry, as well as the appropriate disclaimers of what the letter would not indicate (origin of the batch)?

I'm hoping Rick and I will be able to discuss this on Monday and it would be helpful to have something specific to consider.

Thanks! Steve

Stephen A. Schaible, PRIA Coordinator (acting)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
ph: (703)308-9362

From: Steven J Goldberg [<mailto:steven.goldberg@basf.com>]
Sent: Friday, June 23, 2017 8:47 AM
To: Schaible, Stephen <Schaible.Stephen@epa.gov>
Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>; Ray McAllister (RMcAllister@croplifeamerica.org)
<RMcAllister@croplifeamerica.org>
Subject: RE: Certificates of Origin

Thanks Rick.

Ray, if you let me know what would be best, I can send out a dial in number

Steven J. Goldberg, Vice President & Deputy General Counsel, Regulatory & Government Affairs

Phone: 973-245-6057 Mobile: 201-602-9439 Fax: 973-307-2414 E-Mail: steven.goldberg@basf.com
Postal Address: 100 Park Avenue, Florham Park, NJ, 07932

From: Schaible, Stephen [<mailto:Schaible.Stephen@epa.gov>]

Sent: Friday, June 23, 2017 8:43 AM

To: Steven J Goldberg <steven.goldberg@basf.com>

Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>; Ray McAllister (RMcAllister@croplifeamerica.org)
<RMcAllister@croplifeamerica.org>

Subject: Re: Certificates of Origin

Either time works for me.

Sent from my iPhone

On Jun 23, 2017, at 8:36 AM, Steven J Goldberg <steven.goldberg@basf.com> wrote:

Might we do 1:00 or 3:30?

Steve

Steven J. Goldberg, Vice President & Deputy General Counsel, Regulatory & Government Affairs

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steven.goldberg@basf.com
Postal Address: 100 Park Avenue, Florham Park, NJ, 07932

From: Schaible, Stephen [<mailto:Schaible.Stephen@epa.gov>]

Sent: Friday, June 23, 2017 8:34 AM

To: Steven J Goldberg <steven.goldberg@basf.com>

Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>; Ray McAllister
(RMcAllister@croplifeamerica.org) <RMcAllister@croplifeamerica.org>

Subject: Re: Certificates of Origin

I'm available from 10 on.

Sent from my iPhone

On Jun 23, 2017, at 8:25 AM, Steven J Goldberg <steven.goldberg@basf.com> wrote:

Rick, thanks. Can we tie in Ray McAllister for that as well? Later today would be good. I have time on Monday as well, but the sooner we try to address this issue, the better. If there is a time that can work, I can send out a dial-in number

Steve

Steven J. Goldberg, Vice President & Deputy General Counsel, Regulatory & Government Affairs

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From: Keigwin, Richard [<mailto:Keigwin.Richard@epa.gov>]

Sent: Friday, June 23, 2017 8:19 AM

To: Steven J Goldberg <steven.goldberg@basf.com>

Cc: Schaible, Stephen <Schaible.Stephen@epa.gov>

Subject: Certificates of Origin

Steve S. has done some considerable research and it looks like we may have already provided technical assistance to the PRIA Coalition on this issue. From what I have seen, many of the same challenges that we identified in our previous technical assistance remain.

Perhaps we can find some time to chat either later today or early next week? Steve S. may have a little more availability to discuss this today as I have several meetings downtown today.

Rick Keigwin
Acting Director, Office of Pesticide Programs
US Environmental Protection Agency